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REMARKS/ARGUMENTS

Claims 2-5 and 7-12 are pending in this application. By this amendment, claims 4

and 7 have been amended.

The Examiner has rejected claims 2-5 and 7-12 under 35 USC 103(a) as being

unpatentable over Richards (USP5,343,241) in view of Shinagawa (USP6,137,910) and

over Richards in view of Jung (USP5,978,030).

Shinagawa, which is co-owned by the owner of the present application, describes a

multiresolutional filter that allows source and destination images to be matched (see

Abstract and col. 1, lines 10-15). In particular, Shinagawa relates to a pixel-by-pixel

matching technique as described, for example, with respect to Fig. 3 "wherein the pixels A,

B, C and D of the source image are mapped to A, B, C, D of the destination image" (see

col. 10, lines 54-56). This is in contrast to the present application in which lattice points of a

mesh taken on the first image are matched with points on the second image rather than

using a pixel-by-pixel analysis. In particular, compare Fig. 3 and Figs. 19 and 20 of the

current application. Fig. 3 of the current application corresponds to Fig. 3 of Shinagawa,

showing pixel-by-pixel mapping while Figs. 19 and 20 of the current application represents

the use of lattice points in a mesh that is overlaid on the pixels in the first image. Claims 4

and 7 have been amended to more clearly reflect this distinction.

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Applicant submits that Richards describes a system and method to adjust input

frames of a digital video signal to produce output frames with an increased motion blur

effect (see Abstract). In Richards, intermediate frames are created and then averaged with

each other or with input frames to produce an output frame that replaces the original input

frame (see Figs. 1, 2, and 3). The creation of the intermediate frame or frames is an

intermediate step and the intermediate images themselves are not output as being frames

in between the first and second frames in a sequence as is contemplated in the present

application. Applicant submits that Richards relates to a different problem and solution and,

in addition to not disclosing the mesh and lattice points, does not teach or suggest at least

the element of "outputting the first image and the intermediate images" as claimed in

amended claims 4 and 7.

Jung describes an apparatus and method for encoding a digital video signal to

reduce a transmission rate of the digital video signal using feature point based motion

compensation (see Abstract). In particular, Jung relates to preparing a better estimation of

motion vectors so that a difference or error signal between the current frame and the

predicted current frame (i.e. a frame made by interpolation) do not need to be transmitted

(see col. 14, lines 28-32). Applicant submits that Jung relates to a system in which two

images are matched, one of which is an interpolated (not intermediate) frame generated for

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comparison purposes in order to produce a better compression encoding and not for

output of the interpolated frame itself. In the present application, the intermediate image is

interpolated between two images for output as a part of a video sequence rather than as an

intermediate step in a compression process. As such, Applicant submits that Jung also

relates to a different problem and solution and does not teach or suggest at least the

element of "outputting the first image and the intermediate images" as claimed in amended

claims 4 and 7.

For the foregoing reasons, Applicant submits that amended claims 4 and 7 are in

condition for allowance. Claims 2, 3, 5, and 8-12 depend from one of claims 4 or 7, and, for

at least similar reasons, as well as the additional elements included therein, are also

believed to be in condition for allowance.

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## Conclusion:

In view of the foregoing amendments and remarks it is respectfully submitted that this application is in condition for allowance. Favourable consideration and prompt allowance are earnestly solicited.

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Respectfully submitted

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